

ESTTA Tracking number: **ESTTA433682**

Filing date: **10/04/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91200786
Party	Defendant Bonnie Tseng
Correspondence Address	BONNIE TSENG 3020 LAVISTA COURT DECATUR, GA 30033-1102 UNITED STATES bonnietseng@mindspring.com
Submission	Answer
Filer's Name	Bonnie Tseng
Filer's e-mail	beautv@mindspring.com, bonnietseng@mindspring.com
Signature	/Bonnie Tseng/
Date	10/04/2011
Attachments	BeauTV USPTO Answer to Opposition.pdf ( 2 pages )(78871 bytes ) BeauTV USPTO Certificate of Service for Answer.pdf ( 1 page )(70904 bytes )

**Bonnie Tseng**  
**BeauTV, Inc.**  
3020 LaVista Ct.  
Decatur, GA 30033-1102  
beautv@mindspring.com

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**UNITED STATES PATENT AND TRADEMARK OFFICE**  
**Trademark Trial and Appeal Board**  
P.O. Box 1451  
Alexandria VA 22313-1451

RE: Opposition No. 91200786  
Serial No. 85155593  
Mark: BEAUTV

United Global Media Group, Inc.  
c/o Aaron Silverstein  
Saunders & Silverstein LLP  
14 Cedar St., Suite 224  
Amesbury, MA 01913-1831  
asilverstein@massiplaw.com

v.

Tseng, Bonnie for BeauTV, Inc.

**Trademark Trial and Appeal Board:**

In response to the Plaintiff's Opposition, please find the Applicant's answers below to the Plaintiff's grounds for opposition. Applicant:

1. Accepts ownership of U.S. Application Serial Number 85155593.
2. Accepts that the Opposer owns a family of BEAUTY-formative marks.
3. Accepts that the Opposer owns the U.S. Registration No. 3741286.
4. Accepts that the Opposer owns the U.S. Registration No. 3086867.
5. Accepts that the Opposer owns the U.S. Registration No. 3688141.
6. Accepts that the Opposer owns the U.S. Registration No. 3077921.
7. Accepts that the Opposer owns the U.S. Registration No. 3451561.
8. Accepts that the Opposer owns the U.S. Registration No. 3936977.
9. Accepts that the Opposer owns the U.S. Registration No. 85045748.
10. Accepts that the Opposer owns the U.S. Registration No. 85289521.

11. Denies that Opposer has solely established indisputable common law rights in Opposer's Marks.
12. Denies that Opposer's Marks have solely acquired any of the characteristics listed by Opposer.
13. Denies that Opposer's Marks specifically enjoy priority of use over BEAUTV designation.
14. Denies that the Opposers Marks pre-date filing of the mark BEAUTV.
15. Denies that the BEAUTV designation is likely to cause confusion with Opposer's Mark.
16. Denies that the BEAUTV designation is likely to cause confusion, mistake or deceive persons with the Opposer or the Opposer's Marks.
17. Denies that the BEAUTV designation will dilute the distinction or quality of Opposer's Marks.
18. Denies acting in willful disregard to Opposer's registrations regarding the mark BEAUTV.
19. Denies that the designation BEAUTV was not previously used, and not being used, in commerce for "providing information about beauty."
20. Denies that the designation BEAUTV was never used in commerce for "providing information about beauty,"
21. – 22. Were not listed in Opposer's document.
23. Denies that the registration would affect Opposer's rights.
24. Denies that the registration would be a source of damage to the Opposer.
25. Denies that the registration would lessen the value or cause great loss to Opposer.

Respectfully submitted,



Bonnie Tseng, BeauTV, Inc.  
Dated: October 4, 2011

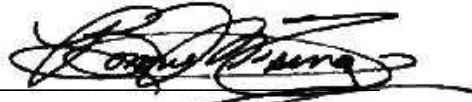
**Bonnie Tseng**  
**BeauTV, Inc.**  
3020 LaVista Ct.  
Decatur, GA 30033-1102  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Response to Opposition has been served to the Opposer's attorney of record as set forth below on October 4, 2011, via first class mail, postage pre-paid to:

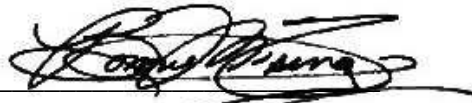
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asilverstein@massiplaw.com



Bonnie Tseng, BeauTV, Inc.

**CERTIFICATE OF TRANSMISSION**

I hereby certify that this correspondence is being submitted electronically via ESTTA on date shown below to the United States Patent and Trademark Office



Bonnie Tseng, BeauTV, Inc.

Date: October 4, 2011